

coating” to a person of ordinary skill in the art. Brenneeman Aff. ¶15. Lacking the required smooth surface, the ’520 patent cannot anticipate the invention as claimed in Claims 1, 3, 5, 6, and 10-12. The rejection of these claims under §102(b) should be withdrawn.

**THE INVENTION SET FORTH IN CLAIMS 1, 3-6, and 8-12
WOULD NOT HAVE BEEN OBVIOUS
IN VIEW OF LIN ET AL., U.S. PATENT NO. 5,071,520**

First and foremost, as set forth above, Lin et al. relates to copper foil with a conventional rough matte surface, and thus is not relevant prior art to the claimed invention of a copper substrate with a “smooth” surface as is required in each of the claims. Second, Lin et al. specifically teaches roughening the surface to maximize adhesion. See, e.g., Col. 1, lines 34-36 (“To maximize adhesion it is desirable to roughen the surface of the foil which contacts the dielectric prior to bonding.”). Thus it would be contrary to the teachings of Lin to start with a smooth substrate, and a person of ordinary skill in the art would not have any motivation to apply the teaching of Lin et al. to a smooth surfaced foil. The difference in the surfaces of Lin et al. on the one hand, and the claimed invention on the other is illustrated in Figs. 1 and 2 accompanying the Brenneeman declaration, which shows that the surfaces are different. The claimed invention is indisputably different from the Lin et al. roughened copper foil, and there is nothing in Lin et al. to suggest a smooth copper foil. Indeed one of the principal teachings of Lin et al. is that a rough surface is important to peel strength. It is therefore surprising in view of Lin et al. that applicants’ levels of peel strength can be obtained, and even more so that the peel strength is relatively resistant to fading upon acid etching.

For at least these reasons, as well as the reasons set forth in the Amendment of November 18, 2005, the invention set forth in the claims is not obvious in view of Lin et al.

CONCLUSION

For at least the foregoing reasons, the rejection of claims 1, 3-6, and 8-12 under 35 USC §§102 and 103 should be withdrawn.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Bryan K. Wheelock', written over a horizontal line.

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